

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

GENERAL LAND OFFICE
OF THE STATE OF TEXAS,

Plaintiff,

v.

UNITED STATES FISH AND WILDLIFE
SERVICE, et al.,

Defendants.

No. A-17-CA-00538-SS

DECLARATION OF THEODORE HADZI-ANTICH

Declarant, Theodore Hadzi-Antich, states as follows:

1. I am a practicing attorney and currently serve as the Senior Attorney in the Center for the American Future of the Texas Public Policy Foundation (“TPPF”).
2. I have been a member in good standing of the Maryland Bar since 1976, the District of Columbia Bar since 1979, the New York Bar since 1987, the Tennessee Bar since 2006, and the California Bar since 2010. I am currently in “active” status in New York and California and “inactive” in Maryland, the District of Columbia, and Tennessee. I am also a member of the bars of the following United States appellate courts: Ninth Circuit, Seventh Circuit, Fifth Circuit, D.C. Circuit, and I am a member of United States district courts in the Northern and Western districts of Texas and the Northern and Western districts of California. I am also a member of the United States Supreme Court Bar.
3. During my 40-plus years of practice as an environmental lawyer, I have served as an attorney at the United States Environmental Protection Agency, the law firm of Dechert Price and Rhoads, the New York State Environmental Facilities Corporation, the law firm

of Jaeckle, Fleishmann & Mugel, the Law Firm of Theodore Hadzi-Antich, the Pacific Legal Foundation and the Texas Public Policy Foundation. I have also served as both an adjunct professor and full-time assistant professor teaching environmental law.

4. I have served as lead counsel on a variety of cases involving the Clean Water Act, the Clean Air Act, and the Endangered Species Act, and the National Environmental Policy Act, and I have counseled clients in connection with those federal statutes as well as Superfund, TSCA, and FIFRA.
5. TPPF was retained to represent the General Land Office of the State of Texas in the instant action.
6. The purpose of this declaration is to set forth record evidence of the attorneys' fees incurred in connection with the above-captioned lawsuit. The TPPF lawyers who have worked on this case, their respective hourly rates, and the hours expended are detailed in Exhibit A of this declaration. The rates charged by Plaintiff's counsel are reasonable and are lower than those set forth in the United States Attorney's Office Fees Matrix for the years 2015-2019 (the "USAO Matrix"), a copy of which is set forth in Exhibit B of this declaration. <https://www.justice.gov/usao-dc/file/796471/download> (last visited on March 8, 2020). The USAO Matrix is updated periodically by the office of the United States Attorney for the District of Columbia and "is intended for use in cases in which a fee-shifting statute permits the prevailing party to recover 'reasonable' attorney's fees." *See* footnote 1 of Exhibit B. The USAO Matrix "was calculated from average hourly rates reported in 2011 survey data for the D.C. metropolitan area, which rates were adjusted for inflation with the Producer Price Index-Office of Lawyers." *Id.* at footnote 2. Although the USAO Matrix by its terms applies only in the District of Columbia, my

understanding is that these rates are in line with, or below, the fees charged in the Austin metropolitan area by attorneys of like experience, skill, and reputation for similar work.

7. As the lead attorney on this case, I assigned work on this matter to my former associate attorney, Erin Wilcox, to my current associate attorney, Ryan D. Walters, and to my paralegal/secretary, Yvonne Simental, at the lowest hourly rate consistent with the skills and time demands necessary to effectively litigate this matter. Through these efforts, I was able to limit the amount of time for which recovery is sought to 1100.45 attorney hours and 53.25 paralegal hours, which is a reasonable amount of time given the complexity of the case. In addition, my direct supervisor, Robert Henneke, spent 55.75 attorney hours overseeing certain aspects of the case, which also is a reasonable amount of time given the complexities of the case. All hourly rates shown in Exhibit A are the actual hourly rates used by TPPF for each attorney for all litigated matters, as follows: T. Hadzi-Antich at \$450 per hour, E. Wilcox at \$185 per hour, R. Walters at \$225 per hour, and R. Henneke at \$350 per hour. The same is true for the paralegal assistant, Y. Simental, at the rate of \$75 per hour.
8. The total attorney and paralegal time for which recovery is sought is \$372,733.75.
9. Because TPPF is a non-profit, neither its client in this litigation, the General Land Office of the State of Texas, nor any other person, organization, or entity was billed for any attorney or paralegal time devoted to this case.
10. As the lead attorney responsible for this case, I reviewed the attached spreadsheet attached as Exhibit A and determined that the listed fees are reasonable after evaluating the following factors:
 - The time and labor required;

- The novelty and difficulty of the questions presented;
 - The skill required to perform the legal services properly;
 - The preclusion of work on other potential matters due to acceptance of the case;
 - The customary fee;
 - That the fee is based on an hourly rate rather than contingent;
 - Time limitations imposed by the circumstances of the case;
 - The issues involved and the results obtained;
 - The experience, reputation, and ability of the attorneys and paralegal;
 - Awards in similar cases.
11. It is the regular practice of TPPF's Center for the American Future to make and keep the types of records set forth in the attachment. These records have been in the custody, supervision and control of TPPF employees and accurately reflect the reasonable attorneys' fees that I have concluded in my professional judgment are appropriate for recovery in this matter.
12. In addition, TPPF's actual out-of-pocket and unreimbursed expenses recoverable under the ESA amount to \$8,454.42, as set forth in Exhibit C. I have personally reviewed such expenses and have determined that they are authorized and reasonable.
13. Accordingly, attorneys' fees and costs are sought in the total amount of \$381,188.17.
14. After the issuance of the mandate by the Court of Appeals and pursuant to Local Rule CV-7(1) the parties conferred in an effort to settle the amount of fees and costs that should be recovered by plaintiff. Although they were not able to settle the matter before the expiration of plaintiff's deadline to file the motion for fees and costs recovery, they

agreed to file a joint motion to put the matter in abeyance pending settlement negotiations. That joint motion is being filed on this day.

I declare under penalty of perjury that the foregoing is true and correct, to the best of my knowledge, and that this declaration was executed on March 20, 2020 in Sacramento, California.

/s/Theodore Hadzi-Antich

THEODORE HADZI-ANTICH

EXHIBIT A

GLO v. U.S. Fish & Wildlife Service, et al

Date	Staff	Task	Time	Rate	Total
1/12/2016	R. Henneke	Email exchange with Alan Glen re: supplemental petition filing	0.25	350 \$	87.50
6/3/2016	T. Hadzi-Antich	Review of developmental issues regarding case challenging ESA golden cheeked warbler	1.50	450 \$	675.00
6/4/2016	R. Henneke	Review supporting and related material document regarding FWS denial of 90 day status review	1	350 \$	350.00
6/4/2016	R. Henneke	Email CAF regarding analysis of supporting and related material documents	0.25	350 \$	87.50
6/7/2016	R. Henneke	Review memo from J. Stonedale regarding ESA Article III standing	0.25	350 \$	87.50
6/7/2016	R. Henneke	Telephone conference with N. Marzulla regarding litigation strategy / Article III standing	0.25	350 \$	87.50
6/7/2016	R. Henneke	Email exchange with S. Combs	1.5	350 \$	525.00
6/10/2016	R. Henneke	Meeting with T. Hadzi-Antich and J. Stonedale regarding GCW litigation strategy, potential legal claims to assert	1.25	350 \$	437.50
6/14/2016	R. Henneke	Telephone conference with S. Combs regarding trial strategy	0.25	350 \$	87.50
9/7/2016	E. Wilcox	Legal research	1.5	185 \$	277.50
9/7/2016	E. Wilcox	Potential case meeting	0.5	185 \$	92.50
9/8/2016	E. Wilcox	Legal research	3	185 \$	555.00
9/9/2016	E. Wilcox	Legal research	2.75	185 \$	508.75
9/12/2016	E. Wilcox	Potential case meeting	0.5	185 \$	92.50
9/12/2016	E. Wilcox	Legal research/writing	4.25	185 \$	786.25
9/12/2016	R. Henneke	Telephone conference with S. Combs regarding case status	0.25	350 \$	87.50
9/13/2016	E. Wilcox	Legal research/writing	3.5	185 \$	647.50
9/13/2016	E. Wilcox	Potential case meeting	0.5	185 \$	92.50
9/14/2016	E. Wilcox	Legal research/writing	4	185 \$	740.00

Date	Staff	Task	Time	Rate	Total
9/15/2016	E. Wilcox	Legal research/writing	5	185 \$	925.00
9/16/2016	E. Wilcox	Legal research	1	185 \$	185.00
9/16/2016	E. Wilcox	Legal research/writing	3.5	185 \$	647.50
9/19/2016	E. Wilcox	Legal research/writing	4.25	185 \$	786.25
9/20/2016	E. Wilcox	Legal research/writing	3.5	185 \$	647.50
9/22/2016	E. Wilcox	Legal research/writing	2.75	185 \$	508.75
9/23/2016	E. Wilcox	Legal research	3	185 \$	555.00
9/26/2016	E. Wilcox	Legal research/writing	4.25	185 \$	786.25
9/27/2016	E. Wilcox	Legal research/writing	4	185 \$	740.00
9/28/2016	E. Wilcox	Legal research/writing	4.5	185 \$	832.50
9/30/2016	E. Wilcox	Legal research/writing	5	185 \$	925.00
10/3/2016	E. Wilcox	Research on 5th and 10th Cir. cass involving claims that species will not survive unless CH is designated	1	185 \$	185.00
10/3/2016	E. Wilcox	Research cases involving claims that agency action should be overturned if purpose of action is impossible to achieve	1.5	185 \$	277.50
10/3/2016	E. Wilcox	Edit memorandum	1	185 \$	185.00
10/12/2016	E. Wilcox	Edit and additional research/content for Warbler memo regarding standing, statue of limitations and tone Research on NEPA and intersection with ESA in 5th, 6th, 9th and 10th Circuits, continuing violation theories in 5th Cir. and beyond, and FRCP amendments pertaining to communications with expert witnesses and discoverable information	1	185 \$	185.00
10/14/2016	E. Wilcox		5	185 \$	925.00
10/18/2016	E. Wilcox	Continued research on NEPA and ESA in the circuit courts Confer with CAF attorney on strategy and memorandum for potential case	2	185 \$	370.00
10/20/2016	E. Wilcox		0.75	185 \$	138.75
10/21/2016	E. Wilcox	Research on NEPA, application to critical habitat designations, potential application to listing and delisting decisions under ESA, treatment in circuit courts Further writing on memorandum	1	185 \$	185.00
10/21/2016	E. Wilcox		1	185 \$	185.00

Date	Staff	Task	Time	Rate	Total
10/24/2016	E. Wilcox	Research statutory and listing criteria, venue, notice requirements, intersection of NEPA and ESA in circuit courts	2	185 \$	370.00
10/24/2016	E. Wilcox	Add research to memorandum	1	185 \$	185.00
11/3/2016	E. Wilcox	Research and edit potential case memorandum	3	185 \$	555.00
		Find and read pleadings related to petition for rehearing en banc in <i>Markle v. FWS</i> ; send to T. Hadzi-Antich; edit short form of Warbler memorandum			
11/4/2016	E. Wilcox	Edits to Warbler short and long memos; communication with CAF team regarding same	0.75	185 \$	138.75
11/11/2016	E. Wilcox	Edits to Warbler short and long memos; communication with CAF team regarding same	0.75	185 \$	138.75
11/14/2016	E. Wilcox	Edits to memo in anticipation of GLO meeting	0.25	185 \$	46.25
12/12/2016	E. Wilcox	Edits to memo in anticipation of GLO meeting	0.5	185 \$	92.50
12/21/2016	E. Wilcox	Draft 60 day notice letter	1	185 \$	185.00
		Confer with GLO General Counsel regarding participation in lawsuit			
12/22/2016	R. Henneke	lawsuit	0.25	350 \$	87.50
12/23/2016	E. Wilcox	Draft 60 day notice letter	1	185 \$	185.00
01/04/2017	E. Wilcox	Confer with co-counsel about telephone call	0.25	185 \$	46.25
		Telephone conference with M. Havens regarding GLO Representation Agreement			
01/04/2017	R. Henneke	Representation Agreement	0.25	350 \$	87.50
01/18/2017	E. Wilcox	Draft 60 day letter	1.50	185 \$	277.50
01/24/2017	E. Wilcox	Draft venue memorandum	2.00	185 \$	370.00
01/24/2017	E. Wilcox	Communication with client regarding 60 day letter	0.50	185 \$	92.50
01/27/2017	E. Wilcox	Draft venue memorandum	2.50	185 \$	462.50
01/27/2017	E. Wilcox	Communication with client regarding 60 day letter	0.50	185 \$	92.50
01/30/2017	E. Wilcox	Edits to 60 day letter	1.00	185 \$	185.00
01/30/2017	E. Wilcox	Communication with client regarding 60 day letter	0.50	185 \$	92.50
01/30/2017	E. Wilcox	Draft venue memorandum	1.00	185 \$	185.00
01/30/2017	E. Wilcox	Review and edit second draft of 60-day notice letter	2.70	450 \$	1,215.00
01/31/2017	T. Hadzi-Antich	Edits to 60 day letter	1.00	185 \$	185.00
02/01/2017	E. Wilcox	Communication with co-counsel regarding venue	0.50	185 \$	92.50

Date	Staff	Task	Time	Rate	Total
02/01/2017	T. Hadzi-Antich	Review of appraisal of the TX GLO property we will wuse for injury-in-fact purposes regarding diminution in value	1.00	450 \$	450.00
02/22/2017	E. Wilcox	Research and draft venue and transfer memo	3.50	185 \$	647.50
02/23/2017	E. Wilcox	Draft venue and transfer memo	1.50	185 \$	277.50
02/23/2017	T. Hadzi-Antich	Work on the venue issues in Warbler case	2.90	450 \$	1,305.00
		Attention to details regarding venue issues and which court is best for us			
02/24/2017	T. Hadzi-Antich	Review and revise 60 day NOI letter	2.70	450 \$	1,215.00
02/24/2017	R. Henneke	Telephone conference with GLO General Counsel regarding case update	1.50	350 \$	525.00
02/24/2017	R. Henneke	Email M. Barenblat regarding 60 day NOI letter	0.50	350 \$	175.00
03/08/2017	T. Hadzi-Antich	Attention to Warbler complaint	0.25	350 \$	87.50
03/08/2017	E. Wilcox	Research on standing for Complaint	1.50	450 \$	675.00
03/09/2017	E. Wilcox	Draft Complaint	1.00	185 \$	185.00
		Confer with T. Hadzi-Antich regarding litigation strategy and potential amicus partners	3.00	185 \$	555.00
03/09/2017	R. Henneke	Discuss Complaint strategy with T. Hadzi-Antich	0.25	350 \$	87.50
03/10/2017	E. Wilcox	Conference call	0.50	185 \$	92.50
03/13/2017	E. Wilcox	Draft Warbler Complaint	1.00	185 \$	185.00
03/16/2017	E. Wilcox	Draft Warbler Complaint	4.00	185 \$	740.00
03/17/2017	E. Wilcox	Draft Warbler Complaint	3.00	185 \$	555.00
03/17/2017	T. Hadzi-Antich	Review and edit Warbler complaint	5.70	450 \$	2,565.00
		Research on Warbler statistics for T. Hadzi-Antich media interview			
03/23/2017	E. Wilcox	Review edits to Complaint with T. Hadzi-Antich	0.75	185 \$	138.75
03/29/2017	E. Wilcox	Warbler complaint edits	0.75	185 \$	138.75
04/03/2017	E. Wilcox	Memorandum to R. Henneke regarding the case	2.50	185 \$	462.50
04/04/2017	T. Hadzi-Antich	Further work on warbler complaint	1.00	450 \$	450.00
04/05/2017	T. Hadzi-Antich	Warbler complaint edits	1.70	450 \$	765.00
04/05/2017	E. Wilcox	Warbler complaint edits	3.00	185 \$	555.00
04/06/2017	E. Wilcox	Warbler complaint edits and additional Research	1.00	185 \$	185.00
04/07/2017	E. Wilcox	Warbler complaint edits	1.00	185 \$	185.00
04/07/2017	T. Hadzi-Antich	Further attention to warbler complaint	0.70	450 \$	315.00
04/12/2017	E. Wilcox	Exhibits for complaint	1.00	185 \$	185.00

Date	Staff	Task	Time	Rate	Total
04/19/2017	T. Hadzi-Antich	Finish third draft of warbler complaint	2.00	450 \$	900.00
04/20/2017	R. Henneke	Review draft Complaint	1.00	350 \$	350.00
04/20/2017	R. Henneke	Email draft Complaint to Client with status update	0.25	350 \$	87.50
05/12/2017	R. Henneke	Email exchange with WH CEQ Mario Loyola regarding NEPA issue raised in GCW 60-day NOI letter	0.50	350 \$	175.00
06/02/2017	R. Henneke	Telephone conference with GLO regarding litigation strategy and preparation for filing lawsuit	0.50	350 \$	175.00
06/05/2017	R. Henneke	Revise Complaint, prepare lawsuit for filing, Review and proofread pleadings and approve to file	2.50	350 \$	875.00
06/05/2017	R. Henneke	Email client regarding filing of lawsuit	0.25	350 \$	87.50
06/05/2017	Y. Simental	Finalize Complaint and file with court	1.00	75 \$	75.00
06/08/2017	Y. Simental	Request issuance of summons and contact process server for service	0.75	75 \$	56.25
07/07/2017	T. Hadzi-Antich	Attention to service documents to local U.S. attorney	0.30	450 \$	135.00
07/10/2017	T. Hadzi-Antich	Further attention to summons to local U.S. attorney	0.30	450 \$	135.00
07/12/2017	E. Wilcox	GCW PLA request response draft	2.00	185 \$	370.00
07/24/2017	T. Hadzi-Antich	Review of proposed intervenors draft motion to intervene which was sent to us as a courtesy	1.50	450 \$	675.00
07/24/2017	R. Henneke	Review email from Defendant-Intervenors regarding proposed Motion to Intervene	0.50	350 \$	175.00
07/24/2017	R. Henneke	Conference with T. Hadzi-Antich regarding response to Defendant-Intervenors' Motion to Intervene	0.50	350 \$	175.00
07/24/2017	R. Henneke	Review email to DOJ Attorney regarding DOJ position regarding Motion to Intervene	0.25	350 \$	87.50
07/27/2017	E. Wilcox	Review motion to intervene from environmental groups and review Western District local rules and Judge Sparks' rules on intervention	0.50	185 \$	92.50
07/27/2017	E. Wilcox	Draft email to T. Hadzi-Antich and R. Henneke regarding same potential case research - intervention and draft intervention	0.75	185 \$	138.75
08/03/2017	E. Wilcox	Research and draft intervention response	3.50	185 \$	647.50
08/04/2017	E. Wilcox	Draft intervention response	1.50	185 \$	277.50
08/06/2017	R. Henneke	Review draft Response to Motion to Intervene	0.50	350 \$	175.00

Date	Staff	Task	Time	Rate	Total
08/06/2017	R. Henneke	Email exchange with T. Hadzi-Antich and E. Wilcox regarding Response to Motion to Intervene	0.25	350 \$	87.50
08/07/2017	E. Wilcox	Edits to intervention response	0.75	185 \$	138.75
08/08/2017	E. Wilcox	Edits to intervention response	0.50	185 \$	92.50
		Email exchange with T. Hadzi-Antich and E. Wilcox regarding Proposed Intervenor's Request for Additional Time			
08/08/2017	R. Henneke	Finalize Plaintiff's Response to Defendants' Motion to Intervene and file with court	0.25	350 \$	87.50
08/08/2017	Y. Simental	Draft Appearance of Counsel for E. Wilcox	1.00	75 \$	75.00
08/15/2017	Y. Simental	Finalize and file Appearance of Counsel for E. Wilcox	0.50	75 \$	37.50
08/16/2017	Y. Simental	Download, circulate and calendar Order Setting Motion to Intervene	0.50	75 \$	37.50
08/21/2017	Y. Simental	Telephone conference with Court Chambers regarding status of Motion to Continue Tuesday's hearing	0.25	75 \$	18.75
08/25/2017	R. Henneke	Review Defendant Intervenor's Reply to Motion to Intervene Conference with Reed Wilson at PERC regarding potential amicus filing	0.25	350 \$	87.50
08/25/2017	R. Henneke	Attention to response to motion to dismiss	7.60	450 \$	3,420.00
09/07/2017	R. Henneke	Further attention to response to motion to dismiss	7.30	450 \$	3,285.00
09/15/2017	T. Hadzi-Antich	Finalized first draft of our repose to the Warbler Motion to Dismiss	4.00	450 \$	1,800.00
09/18/2017	T. Hadzi-Antich	Attention to drafting amendments to complaint	2.00	450 \$	900.00
09/20/2017	R. Henneke	Revise draft response to DOJ's Motion to Dismiss	0.50	350 \$	175.00
09/20/2017	R. Henneke	Review amended complaint	0.25	350 \$	87.50
09/21/2017	E. Wilcox	Proofread response to MTD and amended complaint	0.50	185 \$	92.50
09/21/2017	E. Wilcox	Research & draft opposition to motion for extension	1.00	185 \$	185.00
		Finalize and file Plaintiff's Response to Defendants' Motion to Dismiss			
09/21/2017	Y. Simental	Finalize and file Plaintiff's First Amended Complaint	1.00	75 \$	75.00
09/21/2017	Y. Simental	Review, edit and approve response to DOJ Motion to Dismiss	0.50	75 \$	37.50
09/25/2017	R. Henneke	Dismiss	1.00	350 \$	350.00

Date	Staff	Task	Time	Rate	Total
09/25/2017	R. Henneke	Email exchange with Client regarding Response to DOJ meeting	0.25	350 \$	87.50
09/29/2017	E. Wilcox	Research & draft potential opposition to reply filed out of time	0.50	185 \$	92.50
09/29/2017	E. Wilcox	Research history of 50 CFR 424.14	0.25	185 \$	46.25
10/02/2017	E. Wilcox	Research and draft opposition to motion to file out of time and notice of late filing	2.75	185 \$	508.75
10/03/2017	E. Wilcox	Email information to THA	0.25	185 \$	46.25
10/05/2017	R. Henneke	Briefing with Client GLO A. Idsal on status of litigation, litigation strategy	1.25	350 \$	437.50
10/09/2017	E. Wilcox	Response to 2nd MTD	4.50	185 \$	832.50
10/09/2017	T. Hadzi-Antich	Distinguishing cases in the government's second motion to dismiss	3.70	450 \$	1,665.00
10/10/2017	T. Hadzi-Antich	Attention to Second Amended Complaint	2.00	450 \$	900.00
10/10/2017	E. Wilcox	Response to 2nd MTD	3.75	185 \$	693.75
10/11/2017	E. Wilcox	Edits and response to 2nd MTD	3.50	185 \$	647.50
10/11/2017	E. Wilcox	Draft 2nd Amended Complaint and motion for leave to file	2.25	185 \$	416.25
10/11/2017	R. Henneke	Review defendant-intervenors' proposed Answer	0.25	350 \$	87.50
10/11/2017	T. Hadzi-Antich	Further attention to Response to Second MTD	1.30	450 \$	585.00
10/12/2017	T. Hadzi-Antich	Further attention to Response to 2nd MTD	4.20	450 \$	1,890.00
10/12/2017	T. Hadzi-Antich	Attention for motion for leave to file 2nd amended complaint	1.00	450 \$	450.00
10/12/2017	T. Hadzi-Antich	Correspondence with government counsel regarding second amended complaint	0.50	450 \$	225.00
10/12/2017	E. Wilcox	Edits to response to 2nd MTD, 2nd amended complaint	1.50	185 \$	277.50
10/12/2017	E. Wilcox	Call with THA regarding response to 2nd MTD, 2nd amended complaint, motion for leave to file	0.75	185 \$	138.75
10/16/2017	T. Hadzi-Antich	Attention to finalizing four documents for client review: Response, Motion, Complaint, Proposed Order	6.30	450 \$	2,835.00
10/16/2017	E. Wilcox	Edits and proof response to 2nd MTD, 2nd amended complaint, motion for leave to file, and proposed order	2.00	185 \$	370.00

Date	Staff	Task	Time	Rate	Total
10/16/2017	R. Henneke	Conference with THA regarding strategy for responding to DOJ MTD	0.50	350 \$	175.00
10/16/2017	R. Henneke	Review and revise draft Response to MTD, Motion for Leave to Amend Complaint, and 2nd Amended Complaint Edits and proof response to 2nd MTD, 2nd amended complaint, motion for leave to file, and proposed order Attention to finalizing four documents for client review: Response, Motion, Complaint, Proposed Order	1.75	350 \$	612.50
10/16/2017	E. Wilcox	Final touches on the fourth Warbler documents for filing Compulsive changes in the Response document before filing	2.00	185 \$	370.00
10/16/2017	T. Hadzi-Antich	Download, circulate and calendar Order Setting All Pending Matters	6.30	450 \$	2,835.00
10/17/2017	T. Hadzi-Antich	Finalize and file Plaintiff's Response to Defendants' Motion to Partially Dismiss 1st Amended Complaint	1.80	450 \$	810.00
10/18/2017	T. Hadzi-Antich	Finalize and file Plaintiff's Unopposed Motion for Leave to File 2nd Amended Complaint	0.50	450 \$	225.00
10/18/2017	Y. Simental	Conference with THA regarding setting of MTD for hearing, related matters	0.25	75 \$	18.75
10/19/2017	Y. Simental	Emails back and forth and research on various questions for THA related to Judge Sparks procedures	0.50	75 \$	37.50
10/19/2017	R. Henneke	Finalize and file Second Amended Complaint	0.50	350 \$	175.00
10/19/2017	E. Wilcox		1.50	185 \$	277.50
10/20/2017	Y. Simental		0.50	75 \$	37.50
10/20/2017	R. Henneke	Review Court's Order granting leave to file 2nd A Complaint	0.25	350 \$	87.50
10/20/2017	R. Henneke	Discuss case status, next steps in light of Court's Order Attention to details regarding setting up moot courts for the Warbler Hearing on the MTD	0.25	350 \$	87.50
10/20/2017	T. Hadzi-Antich	Attention to travel plans to Austin for Warbler hearing and moot courts	5.70	450 \$	2,565.00
10/23/2017	T. Hadzi-Antich	Attention to conceptual outline of Warbler hearing presentation	1.40	450 \$	630.00
10/23/2017	T. Hadzi-Antich		4.30	450 \$	1,935.00

Date	Staff	Task	Time	Rate	Total
10/23/2017	E. Wilcox	Phone call with THA regarding plan for MTD and Mot. to Intervene hearing preparation	0.75	185 \$	138.75
10/23/2017	E. Wilcox	Draft oral argument in response to Motion to Intervene and MTD	3.00	185 \$	555.00
10/24/2017	E. Wilcox	Draft opposition argument for MTD and Motion to Intervene Research and draft THA's oral argument on motion to intervene and intervenor's oral argument on motion to intervene, list of potential questions from judge	5.00	185 \$	925.00
10/25/2017	E. Wilcox	Additional research and edits to THA's MTD argument outline	5.25	185 \$	971.25
10/27/2017	E. Wilcox	Draft oral argument for and against MTD	3.50	185 \$	647.50
10/30/2017	E. Wilcox	Attention to prep for hearing regarding the intervention issues	4.00	185 \$	740.00
10/30/2017	T. Hadzi-Antich	Attention to prep for hearing on motion to dismiss claims 1 and 3	2.30	450 \$	1,035.00
10/30/2017	T. Hadzi-Antich	Further prep for hearing on MTD claims 1 and 3	5.20	450 \$	2,340.00
10/31/2017	T. Hadzi-Antich	Edits to oral arguments	2.10	450 \$	945.00
10/31/2017	E. Wilcox	Answers to judge's questions	2.00	185 \$	370.00
10/31/2017	E. Wilcox	Draft additional questions	2.00	185 \$	370.00
10/31/2017	E. Wilcox	Attention to travel plans to Austin for Warbler hearing and moot courts	1.00	185 \$	185.00
11/01/2017	T. Hadzi-Antich	Attention to government's third motion to dismiss and begin to respond	1.00	450 \$	450.00
11/01/2017	T. Hadzi-Antich	Attention to scheduling issues with Devon Flannagan and Judge Spark's chambers	2.00	450 \$	900.00
11/01/2017	T. Hadzi-Antich	Review DOJ 2nd MTD	0.70	450 \$	315.00
11/01/2017	R. Henneke	Call with THA regarding response to Motion to Dismiss	0.75	350 \$	262.50
11/01/2017	E. Wilcox	Response to Motion to Dismiss	1.50	185 \$	277.50
11/01/2017	E. Wilcox	Response to Motion to Dismiss	6.00	185 \$	1,110.00
11/02/2017	E. Wilcox	Response to Motion to Dismiss	4.50	185 \$	832.50
11/03/2017	E. Wilcox	Response to Motion to Dismiss	3.75	185 \$	693.75
11/03/2017	T. Hadzi-Antich	Attention to draft response in connection with statute of limitations issue on Claim 1	6.30	450 \$	2,835.00

Date	Staff	Task	Time	Rate	Total
11/04/2017	T. Hadzi-Antich	Travel from Sacramento to Austin for Warbler and STR moot courts and hearings	3.60	450 \$	1,620.00
11/06/2017	T. Hadzi-Antich	Final arrangements for outside judges for Warbler Moot courts later this week	2.60	450 \$	1,170.00
11/06/2017	R. Henneke	Confer with THA re: conference with opposing counsel prior to MTD hearing	0.25	350 \$	87.50
11/06/2017	E. Wilcox	Case research for response to Motion to Dismiss	2.00	185 \$	370.00
11/07/2017	E. Wilcox	Case research for response to Motion to Dismiss	3.50	185 \$	647.50
11/07/2017	T. Hadzi-Antich	Review of cases cited by government regarding failure to act in prep for moot courts	3.00	450 \$	1,350.00
11/08/2017	T. Hadzi-Antich	Prepare for my first moot court	5.00	450 \$	2,250.00
11/09/2017	E. Wilcox	Response to Motion to Dismiss	4.00	185 \$	740.00
11/09/2017	T. Hadzi-Antich	Prepare for and conduct my first moot court	4.00	450 \$	1,800.00
11/09/2017	E. Wilcox	Response to Motion to Dismiss	4.00	185 \$	740.00
11/10/2017	T. Hadzi-Antich	Made proposal to counsel for government and intervenor applicants to simplify the issues at hearing	2.00	450 \$	900.00
11/10/2017	T. Hadzi-Antich	Prepare for second moot court next week	7.30	450 \$	3,285.00
11/10/2017	E. Wilcox	Review and edit response to Motion to Dismiss	2.00	185 \$	370.00
11/10/2017	E. Wilcox	Prepare opposing counsel argument for Motion to Dismiss moot court	2.50	185 \$	462.50
11/11/2017	E. Wilcox	Review and edit response to Motion to Dismiss	1.50	185 \$	277.50
11/11/2017	T. Hadzi-Antich	Worked on Response to the Third Motion to Dismiss	5.00	450 \$	2,250.00
11/12/2017	T. Hadzi-Antich	Continued work on Warbler 3 MTD response	5.30	450 \$	2,385.00
11/12/2017	E. Wilcox	Review and edit response to Motion to Dismiss	0.75	185 \$	138.75
11/13/2017	R. Walters	Prepare for and participate in moot court	4.50	225 \$	1,012.50
11/13/2017	T. Hadzi-Antich	Prepare for and participate in my Warbler moot court	5.00	450 \$	2,250.00
11/14/2017	R. Walters	Prepare for and participate in moot court	2.00	225 \$	450.00
11/14/2017	E. Wilcox	Moot court	1.50	185 \$	277.50
11/14/2017	E. Wilcox	Case research for Motion to Dismiss oral argument	1.25	185 \$	231.25
11/14/2017	T. Hadzi-Antich	Finalize Warbler response to third MTD	2.30	450 \$	1,035.00
11/14/2017	T. Hadzi-Antich	Teleconference with counsel for government and intervenors	0.50	450 \$	225.00
11/14/2017	T. Hadzi-Antich	Prep for and conduct 2nd Warbler moot court	7.00	450 \$	3,150.00

Date	Staff	Task	Time	Rate	Total
11/14/2017	Y. Simental	Finalize and file Plaintiff's Response to Defendants' Motion to Dismiss 2nd Amended Complaint	0.75	75 \$	56.25
11/15/2017	T. Hadzi-Antich	Further prep for Warbler hearing on MTD claims 1 and 3	4.00	450 \$	1,800.00
11/15/2017	E. Wilcox	Prepare materials for Motion to Dismiss hearing	0.50	185 \$	92.50
11/15/2017	E. Wilcox	Research ESA recovery plans	0.75	185 \$	138.75
11/16/2017	E. Wilcox	Motion to Dismiss hearing	2.25	185 \$	416.25
11/16/2017	E. Wilcox	Research in preparation for Motion to Dismiss hearing	1.50	185 \$	277.50
11/16/2017	R. Walters	Prepare for and participate in moot court	3.00	225 \$	675.00
11/16/2017	R. Henneke	Appearance at hearing on DOJ MTD & D-I Motion for Intervention	1.75	350 \$	612.50
11/21/2017	T. Hadzi-Antich	Review and analyze government reply	2.00	450 \$	900.00
11/21/2017	R. Henneke	Review DOJ's Reply to 2nd MTD, confer with co-counsel	0.50	350 \$	175.00
11/30/2017	R. Henneke	Review Court's dismissal order & confer with counsel	1.00	350 \$	350.00
11/30/2017	E. Wilcox	Attention to Order n Motion to Dismiss and Motion to Intervene	0.50	185 \$	92.50
11/30/2017	E. Wilcox	Research on interlocutory appeals under 28 USC s 1291(b)	1.00	185 \$	185.00
11/30/2017	T. Hadzi-Antich	Read Judge Spark's order and tried to make sense of it in connection with what he said at the hearing	4.30	450 \$	1,935.00
11/30/2017	Y. Simental	Download and circulate Order Dismissing Motion to Dismiss	0.25	75 \$	18.75
12/01/2017	Y. Simental	Download, circulate and calendar Scheduling Order	0.25	75 \$	18.75
12/1/2017	E. Wilcox	Callwith THA regarding interlocutory appeal of order in partial MTD	0.25	185 \$	46.25
12/1/2017	E. Wilcox	Research on interlocutory appeal of order in partial MTD	1.50	185 \$	277.50
12/1/2017	E. Wilcox	Email to THA with results of interlocutory appeal research	0.25	185 \$	46.25
12/01/2017	R. Henneke	Confer with EW regarding legal research on interlocutory appeal of partial 12(b) dismissal	0.50	350 \$	175.00
12/4/2017	E. Wilcox	Draft memo on interlocutory appeals	1.00	185 \$	185.00

Date	Staff	Task	Time	Rate	Total
12/6/2017	E. Wilcox	Research hard copy of CEQ guidance on NEPA application to Section 4; e-mail with THA and RH regarding same	0.50	185 \$	92.50
12/12/2017	E. Wilcox	Attention to Answer to Second Amended Complaint	0.25	185 \$	46.25
		Memo on motion for reconsideration and interlocutory appeal			
12/12/2017	E. Wilcox	Research 28 USC 1927	2.50	185 \$	462.50
12/13/2017	E. Wilcox	Research Count Two remedies	0.50	185 \$	92.50
12/14/2017	E. Wilcox	Research and draft memo on 28 USC 1927	2.00	185 \$	370.00
12/15/2017	E. Wilcox	Research and draft memo on automatic stay for mot for reconsideration and interlocutory review	1.50	185 \$	277.50
12/15/2017	E. Wilcox	Telephone conference with THA re next steps, scheduling conference strategy	1.50	185 \$	277.50
12/15/2017	R. Henneke	Research and write memo on whether a third amended complaint is needed after partial dismissal	0.50	350 \$	175.00
12/19/2017	E. Wilcox	Research and draft memo on en banc hearing and rehearing rules and procedures in 5th Circuit	1.00	185 \$	185.00
12/20/2017	E. Wilcox	Draft memo to file on THA's initial conversation with Neil Wilkins re: expert witness	3.00	185 \$	555.00
12/21/2017	E. Wilcox	Research on admissibility of experts	0.25	185 \$	46.25
01/09/2018	E. Wilcox	Research on admissibility of experts; communicate results to THA	5.00	185 \$	925.00
01/10/2018	E. Wilcox		3.50	185 \$	647.50
01/11/2018	E. Wilcox	Research on permissibility of expert discovery in APA cases	1.50	185 \$	277.50
01/11/2018	E. Wilcox	Edits to joint status and scheduling report	0.50	185 \$	92.50
01/14/2018	E. Wilcox	Review and edit joint status and scheduling report	0.75	185 \$	138.75
01/18/2018	E. Wilcox	Attention to joint scheduling order and reconciling dates	0.75	185 \$	138.75
01/19/2018	E. Wilcox	Draft Notice regarding magistrate	0.50	185 \$	92.50
01/19/2018	E. Wilcox	Create timetable of dates in joint scheduling order	0.50	185 \$	92.50
01/19/2018	Y. Simental	Download, circulate and calendar Scheduling Order	0.25	75 \$	18.75
01/30/2018	Y. Simental	Download, circulate and calendar Scheduling Order	0.25	75 \$	18.75
01/31/2018	E. Wilcox	Attention to Administrative record	3.00	185 \$	555.00
02/05/2018	E. Wilcox	Research and draft sections for settlement offer	2.50	185 \$	462.50

Date	Staff	Task	Time	Rate	Total
02/06/2018	E. Wilcox	Draft and revise settlement offer	1.00	185 \$	185.00
02/06/2018	E. Wilcox	Discuss upcoming assignments and deadlines w/THA	0.25	185 \$	46.25
02/07/2018	E. Wilcox	Review 2nd amended complaint for exhibits and discuss supplementation process w/ THA and YS	0.50	185 \$	92.50
02/08/2018	E. Wilcox	Draft consultation agreement for expert witness Mike Morris	0.75	185 \$	138.75
02/12/2018	E. Wilcox	Meeting with expert witness Mike Morrison and THA	1.50	185 \$	277.50
02/13/2018	Y. Simental	Finalize and file Corrected 2nd Amended Complaint	1.00	75 \$	75.00
02/21/2018	E. Wilcox	Search for and download scholarly articles missing from AR	1.50	185 \$	277.50
02/22/2018	E. Wilcox	Search for and download scholarly articles missing from AR	1.00	185 \$	185.00
02/22/2018	E. Wilcox	Emails w/non-testifying expert on search for scholarly articles missing from AR	0.25	185 \$	46.25
02/22/2018	E. Wilcox	Review & revise draft settlement offer, discuss with co-counsel	0.50	350 \$	175.00
02/23/2018	R. Henneke	Draft ltr to DOJ on missing articles from AR	1.00	185 \$	185.00
02/26/2018	E. Wilcox	Email communications with non-testifying expert re: documents missing from AR	0.50	185 \$	92.50
02/26/2018	E. Wilcox	Investigate documents that should have been included in AR and discuss w/THA how to address them	1.00	185 \$	185.00
02/26/2018	E. Wilcox	Draft proposed joint ADR report	0.50	185 \$	92.50
02/26/2018	R. Walters	Prepare documents for admission to W.D. Texas	3.00	225 \$	675.00
02/27/2018	E. Wilcox	Attention to Defendants' edits to proposed joint ADR report	0.25	185 \$	46.25
02/27/2018	E. Wilcox	Emails with non-testifying expert on missing articles and their relevance	0.50	185 \$	92.50
02/28/2018	E. Wilcox	Read and summarize scholarly articles missing from AR	5.00	185 \$	925.00
02/28/2018	E. Wilcox	Emails to non-testifying expert on relevance of certain articles	0.50	185 \$	92.50
03/01/2018	E. Wilcox	Communicate w/THA via e-mail regarding status of list of documents missing from AR	0.25	185 \$	46.25
03/07/2018	E. Wilcox	Review AR missing docs and discuss w/ THA	0.50	185 \$	92.50
03/14/2018	E. Wilcox	Draft and revise Mot. to Supplement AR	2.25	185 \$	416.25

Date	Staff	Task	Time	Rate	Total
03/15/2018	E. Wilcox	Revise Memo ISO Mot. to Supplement AR	1.00	185 \$	185.00
03/15/2018	E. Wilcox	Draft proposed order and Mot. to Supplement AR	0.50	185 \$	92.50
03/23/2018	E. Wilcox	Review cases in DOJ ltr on supplementing AR	0.25	185 \$	46.25
03/23/2018	E. Wilcox	Review DOJ proposal for additional cases, report on same to THA	0.75	185 \$	138.75
04/05/2018	Y. Simental	Finalize and file Plaintiff's Unopposed Motion for Extension of Time to file MSJ	0.50	75 \$	37.50
04/11/2018	R. Walters	Research re: rules for filing MSJ	3.00	225 \$	675.00
04/12/2018	R. Walters	Research re: rules for filing MSJ	2.25	225 \$	506.25
04/13/2018	R. Walters	Organize administrative record for expert	7.00	225 \$	1,575.00
04/16/2018	R. Walters	Organize administrative record for expert	6.00	225 \$	1,350.00
04/16/2018	R. Walters	Organize administrative record for expert	4.00	225 \$	900.00
04/18/2018	R. Walters	Review past filings in case in preparation for MSJ	6.00	225 \$	1,350.00
04/18/2018	R. Walters	Draft statement of facts for MSJ	6.50	225 \$	1,462.50
04/18/2018	R. Walters	Draft statement of facts for MSJ	7.00	225 \$	1,575.00
04/26/2018	R. Walters	Draft statement of facts for MSJ	3.00	225 \$	675.00
04/26/2018	R. Walters	Review expert's summaries of studies in administrative record	4.00	225 \$	900.00
04/27/2028	R. Walters	Review expert's summaries of studies in administrative record	6.00	225 \$	1,350.00
04/27/2018	R. Walters	Research re: legal standards for review of petitions to delist	6.00	225 \$	1,350.00
05/11/2018	M. Al-Fuhaid	Proofread Plaintiff's Motion for Summary Judgment	4.75	225 \$	1,068.75
05/14/2018	Y. Simental	Cite check, revise and format Plaintiff's MSJ	2.00	75 \$	150.00
05/15/2018	Y. Simental	Finalize and file Plaintiff's MSJ	1.00	75 \$	75.00
05/15/2018	Y. Simental	Finalize and file Plaintiff's Motion to Withdraw and Substitution of Counsel	0.50	75 \$	37.50
7/2/2018	T. Hadzi-Antich	Review and highlight government MSJ	3.2	450 \$	1,440.00
7/3/2018	T. Hadzi-Antich	Work with R. Walters on strategy to address government MSJ	1.7	450 \$	765.00
7/3/2018	T. Hadzi-Antich	Work on response to government MSJ	4.3	450 \$	1,935.00
7/5/2018	T. Hadzi-Antich	Attention to crafting the argument that failure to designate critical habitat should be key response	3.7	450 \$	1,665.00

Date	Staff	Task	Time	Rate	Total
7/10/2018	T. Hadzi-Antich	Teleconference with R. Walters and M. Morrison regarding our response to government MSJ	2.1	450 \$	945.00
7/11/2018	T. Hadzi-Antich	Work on response to government MSJ on failure to act issue	5.6	450 \$	2,520.00
7/12/2018	T. Hadzi-Antich	Review of amicus briefs in support of our position in litigation	2.5	450 \$	1,125.00
7/12/2018	T. Hadzi-Antich	Attention to work with technical consultant regarding "well designed" Warbler study	3.7	450 \$	1,665.00
7/16/2018	T. Hadzi-Antich	Review spreadsheet prepared by M. Morrison and edit same for our response to MSJ	2.7	450 \$	1,215.00
7/16/2018	T. Hadzi-Antich	Comb administrative record to support our "used the standard" argument	3	450 \$	1,350.00
7/18/2018	T. Hadzi-Antich	Attention to language regarding the government used the wrong standard in denying the petition	5.7	450 \$	2,565.00
7/19/2018	T. Hadzi-Antich	Further attention to our response to government MSJ on the "wrong standard" issue	3.8	450 \$	1,710.00
7/20/2018	T. Hadzi-Antich	Further work on Warbler response to government MSJ and incorporation of M. Morrison's suggestions	5.2	450 \$	2,340.00
7/23/2018	T. Hadzi-Antich	Attention to tuning all arguments in the brief in anticipation of final push	6.5	450 \$	2,925.00
7/24/2018	T. Hadzi-Antich	Recraft entire brief to tighten arguments and meet word count	7.2	450 \$	3,240.00
7/25/2018	T. Hadzi-Antich	Further work on brief after R. Walters incorporated material from M. Morrison	6.7	450 \$	3,015.00
7/26/2018	T. Hadzi-Antich	Further work fine-tuning the brief for word count and persuasiveness	7.6	450 \$	3,420.00
7/27/2018	T. Hadzi-Antich	Further work on brief in final push	8	450 \$	3,600.00
7/29/2018	T. Hadzi-Antich	Work on finalizing brief	7.4	450 \$	3,330.00
7/30/2018	T. Hadzi-Antich	Revise brief in response to comments received from clients and others	1.7	450 \$	765.00
7/30/2018	T. Hadzi-Antich	Attention to M. Morrison invoice	0.2	450 \$	90.00
7/31/2018	T. Hadzi-Antich	Final review of brief before authorizing Y. Simental to file	1	450 \$	185.00

Date	Staff	Task	Time	Rate	Total
7/31/2018	Y. Simental	Finalize and file Plaintiffs Opposition to Defendants' Cross MSJ and Reply	1.5	75 \$	112.50
8/15/2018	T. Hadzi-Antich	Review of government's reply brief	2.1	450 \$	945.00
		Download and circulate Order Granting Cross MSJ and Final Judgment	0.25	75 \$	18.75
2/6/2019	Y. Simental	Read Warbler opinion and send to client	1.2	450 \$	540.00
2/6/2019	T. Hadzi-Antich				
2/6/2019	R. Walters	Review order denying our MSJ and granting FWS's MSJ	1.25	225 \$	281.25
		Prepare for and participate in conference call with clients and R. Henneke regarding appeal strategy			
2/7/2019	R. Walters	Attention to review of options for notice of appeal to 5th Cir.: what to leave in and what to leave out	2	225 \$	450.00
2/12/2019	T. Hadzi-Antich	Further attention to scope of appeal to 5th Cir.	5.7	450 \$	2,565.00
2/13/2019	T. Hadzi-Antich	Further attention to case law to determine whether claims 1 and 3 should be appealed	6.3	450 \$	2,835.00
2/14/2019	T. Hadzi-Antich	Attention to which claims to appeal to 5th Cir.	2.7	450 \$	1,215.00
2/21/2019	T. Hadzi-Antich	Draft Notice of Appeal	3.2	450 \$	1,440.00
2/25/2019	R. Walters	Notice of appeal to 5th Cir.	1	225 \$	225.00
2/26/2019	T. Hadzi-Antich	Review of key parts of administrative record for appeal	1.9	450 \$	855.00
2/26/2019	T. Hadzi-Antich	Finalize and file notice of appeal	5.7	450 \$	2,565.00
3/1/2019	T. Hadzi-Antich	Draft, finalize and file Notice of Appeal	3.4	450 \$	1,530.00
3/1/2019	Y. Simental	Notice of Appearance filed	2	75 \$	150.00
3/7/2019	T. Hadzi-Antich		0.2	450 \$	90.00
3/8/2019	Y. Simental	Prepare Transcript Order form and forward to court reporter	1	75 \$	75.00
3/11/2019	Y. Simental	Draft, finalize and file Notice of Appearance for R. Henneke and T. Hadzi-Antich	1	75 \$	75.00
3/12/2019	Y. Simental	Draft, finalize and file Notice of Appearance for R. Walters	0.5	75 \$	37.50
3/12/2019	T. Hadzi-Antich	Research assignment for C. Applegate	1.2	450 \$	540.00
3/13/2019	T. Hadzi-Antich	Review of transcript if hearing before Judge Sparks	3.6	450 \$	1,620.00
3/13/2019	Y. Simental	Download, circulate and calendar Briefing Notice	0.5	75 \$	37.50
3/14/2019	T. Hadzi-Antich	Further work with C. Applegate on her assignment	0.7	450 \$	315.00

Date	Staff	Task	Time	Rate	Total
3/14/2019	T. Hadzi-Antich	Further attention to transcript of hearing before Judge Sparks	1.3	450 \$	585.00
3/14/2019	T. Hadzi-Antich	Compile and send documents to R. Walters on claims 1 and 3	1.4	450 \$	630.00
3/19/2019	R. Walters	Draft opening brief in 5th Cir.	2.25	225 \$	506.25
3/20/2019	R. Walters	Review 5th Cir. rules regarding administrative record and review record in case	5.75	225 \$	1,293.75
3/28/2019	T. Hadzi-Antich	Read Yeakel's opinion in BCH case and found good language for Warbler	0.7	450 \$	315.00
4/1/2019	R. Walters	Draft Opening Brief in 5th Cir.	4.75	450 \$	2,137.50
4/2/2019	R. Walters	Draft Opening Brief in 5th Cir.	3	225 \$	675.00
4/3/2019	R. Walters	Draft Opening Brief in 5th Cir.	3	225 \$	675.00
4/4/2019	R. Walters	Draft Opening Brief in 5th Cir.	2.5	225 \$	562.50
4/4/2019	T. Hadzi-Antich	Attention to appeal to 5th Cir. substantive issues	2.3	450 \$	1,035.00
4/5/2019	R. Walters	Draft Opening Brief in 5th Cir.	5	225 \$	1,125.00
4/8/2019	R. Walters	Draft Opening Brief in 5th Cir.	4	225 \$	900.00
4/9/2019	R. Walters	Draft Opening Brief in 5th Cir.	2.25	225 \$	506.25
4/10/2019	R. Walters	Draft Opening Brief in 5th Cir.	2	225 \$	450.00
4/11/2019	T. Hadzi-Antich	Attention to drafting brief regarding claim 3 NEPA issues	7.7	450 \$	3,465.00
4/12/2019	T. Hadzi-Antich	Further attention to claim 3 issues in opening brief	6.7	450 \$	3,015.00
4/15/2019	T. Hadzi-Antich	Attention to argument on claim 2 issues in opening brief	8.5	450 \$	3,825.00
4/15/2019	R. Walters	Review T. Hadzi-Antich's revised draft of opening brief in 5th Cir.	2.5	225 \$	562.50
4/16/2019	R. Walters	Revise draft opening brief	4	225 \$	900.00
4/16/2019	T. Hadzi-Antich	Further attention to claim 2 issues and record cites regarding same in opening brief	9.7	450 \$	4,365.00
4/17/2019	T. Hadzi-Antich	Further attention to claim 2 issues in Warbler and edit entire brief for persuasiveness	7.5	450 \$	3,375.00
4/17/2019	R. Walters	Review T. Hadzi-Antich's revised draft of opening brief in 5th Cir.	2	225 \$	450.00
4/18/2019	R. Walters	Revise draft opening brief	3	225 \$	675.00

Date	Staff	Task	Time	Rate	Total
4/18/2019	T. Hadzi-Antich	Incorporate client comments into opening brief and review entire brief for consistency	5.7	450 \$	2,565.00
4/18/2019	R. Henneke	Revise Appellant's Brief	4.5	350 \$	1,575.00
4/18/2019	Y. Simental	Cite check, revise and format Appellant's Brief	6	75 \$	450.00
4/18/2019	Y. Simental	Gather and prepare documents for Record Excerpts	2	75 \$	150.00
4/19/2019	Y. Simental	Cite check, revise and format Appellant's Brief	5	75 \$	375.00
4/19/2019	Y. Simental	Gather and prepare documents for Record Excerpts	3	75 \$	225.00
4/19/2019	T. Hadzi-Antich	Review cite check draft, make adjustments as necessary and review entire document	8.3	450 \$	3,735.00
4/19/2019	T. Hadzi-Antich	Multiple emails and phone conversations with Y. Simental and R. Walters to finalize opening brief	2.8	450 \$	1,260.00
4/19/2019	R. Walters	Review citations and excerpts of record in draft opening brief in 5th Cir.	2	225 \$	450.00
4/20/2019	R. Walters	Review citations and excerpts of record in draft opening brief in 5th Cir.	3.5	225 \$	787.50
4/20/2019	T. Hadzi-Antich	Full "fresh look" at entire brief and EOR; Attention to jots and titles	7.9	450 \$	3,555.00
4/22/2019	T. Hadzi-Antich	Final approval for brief to file	2.3	450 \$	1,035.00
4/22/2019	R. Walters	Final review of opening brief in 5th Cir. before filing	1.25	225 \$	281.25
4/22/2019	Y. Simental	Finalize and file Appellant's Brief	1.5	75 \$	112.50
4/22/2019	Y. Simental	Finalize and file Record Excerpts	0.5	75 \$	37.50
4/26/2019	T. Hadzi-Antich	Review of amicus briefs filed in Warbler case	3.2	450 \$	1,440.00
4/29/2019	R. Walters	Review amicus briefs filed in support of GLO	3.25	225 \$	731.25
4/30/2019	R. Walters	Review amicus briefs filed in support of GLO	3	225 \$	675.00
6/21/2019	R. Henneke	Review DOJ Appellee Brief	1.25	350 \$	437.50
6/24/2019	T. Hadzi-Antich	Begin review of FWS Response Brief	7.8	450 \$	3,510.00
6/25/2019	T. Hadzi-Antich	Continue review of FWS Response Brief	6.7	450 \$	3,015.00
6/26/2019	T. Hadzi-Antich	Continue review of FWS Response Brief	7.5	450 \$	3,375.00
6/27/2019	T. Hadzi-Antich	Continue review of FWS Response Brief	7.4	450 \$	3,330.00
6/28/2019	T. Hadzi-Antich	Finish review of FWS Response Brief	7.8	450 \$	3,510.00
7/1/2019	T. Hadzi-Antich	Attention to reply in Warbler case, concentrating on statute of limitations issues for failure to designate critical habitat	6.7	450 \$	3,015.00

Date	Staff	Task	Time	Rate	Total
7/1/2019	R. Walters	Draft reply brief in 5th Cir.	4.75	225 \$	1,068.75
7/2/2019	R. Walters	Draft reply brief in 5th Cir.	5	225 \$	1,125.00
		Further attention to statute of limitations issue for reply regarding designation of critical habitat			
7/2/2019	T. Hadzi-Antich	Further attention to statute of limitations issue for reply regarding designation of critical habitat	8.3	450 \$	3,735.00
7/3/2019	T. Hadzi-Antich	Draft reply brief in 5th Cir.	8.7	450 \$	3,915.00
7/3/2019	R. Walters	Draft reply brief in 5th Cir.	3	225 \$	675.00
7/4/2019	R. Walters	Draft reply brief in 5th Cir.	3.25	225 \$	731.25
7/5/2019	R. Walters	Draft reply brief in 5th Cir.	3.5	225 \$	787.50
7/8/2019	R. Walters	Draft reply brief in 5th Cir.	4	225 \$	900.00
7/8/2019	T. Hadzi-Antich	Attention to statute of limitations for NEPA for Reply	9.4	450 \$	4,230.00
		Further attention to statute of limitations issues for NEPA for Reply			
7/9/2019	T. Hadzi-Antich	Draft reply brief in 5th Cir.	5.3	450 \$	2,385.00
7/9/2019	R. Walters	Draft reply brief in 5th Cir.	4.5	225 \$	1,012.50
7/10/2019	R. Walters	Draft reply brief in 5th Cir.	3	225 \$	675.00
		Attention to claim 2 issues of FWS using the wrong standard during 90 day review for Reply			
7/10/2019	T. Hadzi-Antich	Work with outside technical consultant on various studies for support of claim 2 argument in Reply	8.7	450 \$	3,915.00
7/11/2019	T. Hadzi-Antich	Draft reply brief in 5th Cir.	7.2	450 \$	3,240.00
7/11/2019	R. Walters	Draft reply brief in 5th Cir.	2.25	225 \$	506.25
7/12/2019	R. Walters	Draft reply brief in 5th Cir.	3	225 \$	675.00
		Further attention to how FWS impermissibly pitted studies against each other for Reply brief			
7/12/2019	T. Hadzi-Antich	Draft reply brief in 5th Cir.	8.4	450 \$	3,780.00
7/13/2019	R. Walters	Draft reply brief in 5th Cir.	3.25	225 \$	731.25
7/14/2019	R. Walters	Draft reply brief in 5th Cir.	4.5	225 \$	1,012.50
7/15/2019	R. Walters	Draft reply brief in 5th Cir.	4	225 \$	900.00
		Further attention to claim 2 for reply brief regarding details of impermissibly pitting studies against each other			
7/15/2019	T. Hadzi-Antich	Bring arguments of the three claims into a coordinated whole for Reply Brief	9.5	450 \$	4,275.00
7/16/2019	T. Hadzi-Antich	Cite check, revise and format Reply Brief	8.3	450 \$	3,735.00
7/16/2019	Y. Simental	Cite check, revise and format Reply Brief	6	75 \$	450.00
7/17/2019	Y. Simental	Cite check, revise and format Reply Brief	5	75 \$	375.00

Date	Staff	Task	Time	Rate	Total
7/17/2019	T. Hadzi-Antich	Further work on various aspects of reply brief, including the three claims and making sure all FWS points were addressed	9.7	450 \$	4,365.00
7/17/2019	R. Walters	Draft reply brief in 5th Cir.	5.25	225 \$	1,181.25
7/17/2019	R. Henneke	Revise Reply Brief	1.5	350 \$	525.00
7/18/2019	Y. Simental	Finalize and file Reply Brief	1	75 \$	75.00
7/18/2019	T. Hadzi-Antich	Final review and edit of reply brief	3.4	450 \$	1,530.00
9/20/2019	T. Hadzi-Antich	Attention to 5th Cir. notice regarding oral argument	0.7	450 \$	315.00
		Download, circulate and calendar Court's Notice regarding setting for oral argument			
10/24/2019	Y. Simental	Attention to preliminary preparation for Warbler oral argument	0.25	75 \$	18.75
10/24/2019	T. Hadzi-Antich	Make arrangements for Warbler moot court	1.2	450 \$	540.00
10/28/2019	T. Hadzi-Antich	Make flight arrangements for Warbler oral argument	1.7	450 \$	765.00
10/28/2019	T. Hadzi-Antich	Review of record on appeal in preparation for acting as judge in moot court	1.5	450 \$	675.00
11/7/2019	T. Hadzi-Antich	Submit revised oral argument form to 5th Cir.	4.8	450 \$	2,160.00
11/8/2019	T. Hadzi-Antich	Further preparation for moot court	0.5	450 \$	225.00
11/11/2019	T. Hadzi-Antich	Read appellate briefs in preparation for moot court	6.3	450 \$	2,835.00
11/11/2019	M. Al-Fuhaid	Read appellate briefs in preparation for moot court	1	225 \$	225.00
11/12/2019	M. Al-Fuhaid	Attend Warbler moot court	2	225 \$	450.00
11/12/2019	A. Barnes	Further preparation for moot court and participation as judge	2.5	225 \$	562.50
11/12/2019	T. Hadzi-Antich	Attention to outline for oral argument	4.5	450 \$	2,025.00
11/12/2019	T. Hadzi-Antich	Further work on preparation for oral argument	3.7	450 \$	1,665.00
11/13/2019	T. Hadzi-Antich	Prepare for second moot court	1.7	450 \$	765.00
11/14/2019	T. Hadzi-Antich	Moot court with R. Walters in preparation for 5th Cir. oral argument in December	4.3	450 \$	1,935.00
11/19/2019	M. Al-Fuhaid	Review of law professors' amicus brief	2	225 \$	450.00
11/20/2019	T. Hadzi-Antich	Prepare questions for R. Walters to prep him for oral	3.1	450 \$	1,395.00
11/20/2019	T. Hadzi-Antich	Further attention to preparing tough questions for R.	5.3	450 \$	2,385.00
11/21/2019	T. Hadzi-Antich	Research on previous decisions by Judges on the Panel	7.5	450 \$	3,375.00
11/26/2019	A. Barnes	Meeting with R. Walters to prepare for oral argument	2	225 \$	450.00
12/2/2019	R. Henneke		1	350 \$	350.00

Date	Staff	Task	Time	Rate	Total
12/3/2019	R. Henneke	Travel to New Orleans for oral argument	4	350 \$	1,400.00
12/3/2019	R. Henneke	Prepare for oral argument	3	350 \$	1,050.00
12/3/2019	R. Henneke	Practice argument at 5th Cir.	1	350 \$	350.00
12/4/2019	R. Henneke	Appearance at 5th Cir. argument	2	350 \$	700.00
12/4/2019	R. Henneke	Post argument meeting with clients and counsel	2	350 \$	700.00
12/4/2019	R. Henneke	Return travel from New Orleans	5	350 \$	1,750.00
12/4/2019	T. Hadzi-Antich	Listen to oral argument of Warbler in 5th Cir.	1	450 \$	450.00
1/15/2020	R. Henneke	Review 5th Cir. Opinion	0.75	350 \$	262.50
1/15/2020	R. Henneke	Confer with co-counsel regarding 5th Cir. opinion	0.5	350 \$	175.00
1/15/2020	R. Henneke	Email client regarding 5th Cir. Opinion	0.25	350 \$	87.50
1/15/2020	Y. Simental	Download and circulate Opinion	0.25	75 \$	18.75
			1153.65		\$ 372,733.75

EXHIBIT B

USAO ATTORNEY'S FEES MATRIX — 2015-2019*Revised Methodology starting with 2015-2016 Year*

Years (Hourly Rate for June 1 – May 31, based on change in PPI-OL since January 2011)

Experience	2015-16	2016-17	2017-18	2018-19
31+ years	568	581	602	613
21-30 years	530	543	563	572
16-20 years	504	516	536	544
11-15 years	455	465	483	491
8-10 years	386	395	410	417
6-7 years	332	339	352	358
4-5 years	325	332	346	351
2-3 years	315	322	334	340
Less than 2 years	284	291	302	307
Paralegals & Law Clerks	154	157	164	166

Explanatory Notes

1. This matrix of hourly rates for attorneys of varying experience levels and paralegals/law clerks has been prepared by the Civil Division of the United States Attorney's Office for the District of Columbia (USAO) to evaluate requests for attorney's fees in civil cases in District of Columbia courts. The matrix is intended for use in cases in which a fee-shifting statute permits the prevailing party to recover "reasonable" attorney's fees. *See, e.g.*, 42 U.S.C. § 2000e-5(k) (Title VII of the 1964 Civil Rights Act); 5 U.S.C. § 552(a)(4)(E) (Freedom of Information Act); 28 U.S.C. § 2412(b) (Equal Access to Justice Act). The matrix has not been adopted by the Department of Justice generally for use outside the District of Columbia, or by other Department of Justice components, or in other kinds of cases. The matrix does **not** apply to cases in which the hourly rate is limited by statute. *See* 28 U.S.C. § 2412(d).
2. A "reasonable fee" is a fee that is sufficient to attract an adequate supply of capable counsel for meritorious cases. *See, e.g., Perdue v. Kenny A. ex rel. Winn*, 559 U.S. 542, 552 (2010). Consistent with that definition, the hourly rates in the above matrix were calculated from average hourly rates reported in 2011 survey data for the D.C. metropolitan area, which rates were adjusted for inflation with the Producer Price Index-Office of Lawyers (PPI-OL) index. The survey data comes from ALM Legal Intelligence's 2010 & 2011 Survey of Law Firm Economics. The PPI-OL index is available at <http://www.bls.gov/ppi>. On that page, under "PPI Databases," and "Industry Data (Producer Price Index - PPI)," select either "one screen" or "multi-screen" and in the resulting window use "industry code" 541110 for "Offices of Lawyers" and "product code" 541110541110 for "Offices of Lawyers." The average hourly rates from the 2011 survey data are multiplied by the PPI-OL index for May in the year of the update, divided by 176.6, which is the PPI-OL index for January 2011, the month of the survey data, and then rounding to the nearest whole dollar (up if remainder is 50¢ or more).
3. The PPI-OL index has been adopted as the inflator for hourly rates because it better reflects the mix of legal services that law firms collectively offer, as opposed to the legal services that typical consumers use, which is what the CPI-

Legal Services index measures. Although it is a national index, and not a local one, *cf. Eley v. District of Columbia*, 793 F.3d 97, 102 (D.C. Cir. 2015) (noting criticism of national inflation index), the PPI-OL index has historically been generous relative to other possibly applicable inflation indexes, and so its use should minimize disputes about whether the inflator is sufficient.

4. The methodology used to compute the rates in this matrix replaces that used prior to 2015, which started with the matrix of hourly rates developed in *Laffey v. Northwest Airlines, Inc.* 572 F. Supp. 354 (D.D.C. 1983), *aff'd in part, rev'd in part on other grounds*, 746 F.2d 4 (D.C. Cir. 1984), *cert. denied*, 472 U.S. 1021 (1985), and then adjusted those rates based on the Consumer Price Index for All Urban Consumers (CPI-U) for the Washington-Baltimore (DC-MD-VA-WV) area. Because the USAO rates for the years 2014-15 and earlier have been generally accepted as reasonable by courts in the District of Columbia, *see* note 9 below, the USAO rates for those years will remain the same as previously published on the USAO's public website. That is, the USAO rates for years prior to and including 2014-15 remain based on the prior methodology, *i.e.*, the original *Laffey* Matrix updated by the CPI-U for the Washington-Baltimore area. *See Citizens for Responsibility & Ethics in Washington v. Dep't of Justice*, 142 F. Supp. 3d 1 (D.D.C. 2015) and Declaration of Dr. Laura A. Malowane filed therein on Sept. 22, 2015 (Civ. Action No. 12-1491, ECF No. 46-1) (confirming that the USAO rates for 2014-15 computed using prior methodology are reasonable).
5. Although the USAO will not issue recalculated *Laffey* Matrices for past years using the new methodology, it will not oppose the use of that methodology (if properly applied) to calculate reasonable attorney's fees under applicable fee-shifting statutes for periods prior to June 2015, provided that methodology is used consistently to calculate the entire fee amount. Similarly, although the USAO will no longer issue an updated *Laffey* Matrix computed using the prior methodology, it will not oppose the use of the prior methodology (if properly applied) to calculate reasonable attorney's fees under applicable fee-shifting statutes for periods after May 2015, provided that methodology is used consistently to calculate the entire fee amount.
6. The various "brackets" in the column headed "Experience" refer to the attorney's years of experience practicing law. Normally, an attorney's experience will be calculated starting from the attorney's graduation from law school. Thus, the "Less than 2 years" bracket is generally applicable to attorneys in their first and second years after graduation from law school, and the "2-3 years" bracket generally becomes applicable on the second anniversary of the attorney's graduation (*i.e.*, at the beginning of the third year following law school). *See Laffey*, 572 F. Supp. at 371. An adjustment may be necessary, however, if the attorney's admission to the bar was significantly delayed or the attorney did not otherwise follow a typical career progression. *See, e.g., EPIC v. Dep't of Homeland Sec.*, 999 F. Supp. 2d 61, 70-71 (D.D.C. 2013) (attorney not admitted to bar compensated at "Paralegals & Law Clerks" rate); *EPIC v. Dep't of Homeland Sec.*, 982 F. Supp. 2d 56, 60-61 (D.D.C. 2013) (same). The various experience levels were selected by relying on the levels in the ALM Legal Intelligence 2011 survey data. Although finer gradations in experience level might yield different estimates of market rates, it is important to have statistically sufficient sample sizes for each experience level. The experience categories in the current USAO Matrix are based on statistically significant sample sizes for each experience level.
7. ALM Legal Intelligence's 2011 survey data does not include rates for paralegals and law clerks. Unless and until reliable survey data about actual paralegal/law clerk rates in the D.C. metropolitan area become available, the USAO will compute the hourly rate for Paralegals & Law Clerks using the most recent historical rate from the USAO's former *Laffey* Matrix (*i.e.*, \$150 for 2014-15) updated with the PPI-OL index. The formula is \$150 multiplied by the PPI-OL index for May in the year of the update, divided by 194.3 (the PPI-OL index for May 2014), and then rounding to the nearest whole dollar (up if remainder is 50¢ or more).
8. The USAO anticipates periodically revising the above matrix if more recent reliable survey data becomes available, especially data specific to the D.C. market, and in the interim years updating the most recent survey data with the PPI-OL index, or a comparable index for the District of Columbia if such a locality-specific index becomes available.
9. Use of an updated *Laffey* Matrix was implicitly endorsed by the Court of Appeals in *Save Our Cumberland Mountains v. Hodel*, 857 F.2d 1516, 1525 (D.C. Cir. 1988) (en banc). The Court of Appeals subsequently stated that parties may rely on the updated *Laffey* Matrix prepared by the USAO as evidence of prevailing market rates for litigation counsel in the Washington, D.C. area. *See Covington v. District of Columbia*, 57 F.3d 1101, 1105 & n.14, 1109 (D.C. Cir. 1995), *cert. denied*, 516 U.S. 1115 (1996). Most lower federal courts in the District of Columbia

have relied on the USAO's *Laffey* Matrix, rather than the so-called "*Salazar* Matrix" (also known as the "LSI Matrix" or the "Enhanced *Laffey* Matrix"), as the "benchmark for reasonable fees" in this jurisdiction. *Miller v. Holzmman*, 575 F. Supp. 2d 2, 18 n.29 (D.D.C. 2008) (quoting *Pleasants v. Ridge*, 424 F. Supp. 2d 67, 71 n.2 (D.D.C. 2006)); see, e.g., *Joaquin v. Friendship Pub. Charter Sch.*, 188 F. Supp. 3d 1 (D.D.C. 2016); *Prunty v. Vivendi*, 195 F. Supp. 3d 107 (D.D.C. 2016); *CREW v. U.S. Dep't of Justice*, 142 F. Supp. 3d 1 (D.D.C. 2015); *McAllister v. District of Columbia*, 21 F. Supp. 3d 94 (D.D.C. 2014); *Embassy of Fed. Republic of Nigeria v. Ugwuonye*, 297 F.R.D. 4, 15 (D.D.C. 2013); *Berke v. Bureau of Prisons*, 942 F. Supp. 2d 71, 77 (D.D.C. 2013); *Fisher v. Friendship Pub. Charter Sch.*, 880 F. Supp. 2d 149, 154-55 (D.D.C. 2012); *Sykes v. District of Columbia*, 870 F. Supp. 2d 86, 93-96 (D.D.C. 2012); *Heller v. District of Columbia*, 832 F. Supp. 2d 32, 40-49 (D.D.C. 2011); *Hayes v. D.C. Public Schools*, 815 F. Supp. 2d 134, 142-43 (D.D.C. 2011); *Queen Anne's Conservation Ass'n v. Dep't of State*, 800 F. Supp. 2d 195, 200-01 (D.D.C. 2011); *Woodland v. Viacom, Inc.*, 255 F.R.D. 278, 279-80 (D.D.C. 2008); *American Lands Alliance v. Norton*, 525 F. Supp. 2d 135, 148-50 (D.D.C. 2007). But see, e.g., *Salazar v. District of Columbia*, 123 F. Supp. 2d 8, 13-15 (D.D.C. 2000). Since initial publication of the instant USAO Matrix in 2015, numerous courts similarly have employed the USAO Matrix rather than the *Salazar* Matrix for fees incurred since 2015. E.g., *Electronic Privacy Information Center v. United States Drug Enforcement Agency*, 266 F. Supp. 3d 162, 171 (D.D.C. 2017) ("After examining the case law and the supporting evidence offered by both parties, the Court is persuaded that the updated USAO matrix, which covers billing rates from 2015 to 2017, is the most suitable choice here.") (requiring recalculation of fees that applicant had computed according to *Salazar* Matrix); *Clemente v. FBI*, No. 08-1252 (BJR) (D.D.C. Mar. 24, 2017), 2017 WL 3669617, at *5 (applying USAO Matrix, as it is "based on much more current data than the *Salazar* Matrix"); *Gatore v. United States Dep't of Homeland Security*, 286 F. Supp. 3d 25, 37 (D.D.C. 2017) (although plaintiff had submitted a "'great deal of evidence regarding [the] prevailing market rates for complex federal litigation' to demonstrate that its requested [*Salazar*] rates are entitled to a presumption of reasonableness, . . . the Court nonetheless concludes that the defendant has rebutted that presumption and shown that the current USAO Matrix is the more accurate matrix for estimating the prevailing rates for complex federal litigation in this District"); *DL v. District of Columbia*, 267 F. Supp. 3d 55, 70 (D.D.C. 2017) ("the USAO Matrix ha[s] more indicia of reliability and more accurately represents prevailing market rates" than the *Salazar* Matrix). The USAO contends that the *Salazar* Matrix is fundamentally flawed, does not use the *Salazar* Matrix to determine whether fee awards under fee-shifting statutes are reasonable, and will not consent to pay hourly rates calculated with the methodology on which that matrix is based. The United States recently submitted an appellate brief that further explains the reliability of the USAO Matrix vis-à-vis the *Salazar* matrix. See Br. for the United States as *Amicus Curiae* Supporting Appellees, *DL v. District of Columbia*, No. 18-7004 (D.C. Cir. filed July 20, 2018).

EXHIBIT C

EXPENSES - GLO v. USFWS, ET AL.

Date	Description:	Amount
5/15/2017	Clerk, U.S. District Court - Filing Fee Pro Hac Vice Motion for T. Hadzi-Antich	100.00
6/5/2017	Pay.gov - Filing fee for Org. Complaint U.S. Dist. Court for Western Dist.	400.00
6/13/2017	Postage - CMRRR 5 packages	94.95
6/19/2017	Postage - CMRRR	17.75
7/12/2017	Postage - CMRRR	13.90
12/4/2017	Lily Reznik - Court Reporter Transcript of Motion Hearing on 11/16/17	152.60
2/19/2018	Postage - CMRRR	4.87
3/2/2018	Michael Morrison - Expert Fees	2581.32
4/30/2018	Michael Morrison - Expert Fees	1740.00
7/31/2018	Michael Morrison - Expert Fees	1680.00
3/1/2019	Pay.gov - Filing Fees Notice of Appeal 5th Cir.	505.00
6/4/2019	Lit&More - Hard copies of brief to 5th Cir.	160.71
8/23/2019	Lit&More - Hard copies of reply to 5th Cir.	105.45

11/5/2019	Southwest Airlines - Roundtrip airfare for R. Henneke to attend oral argument in New Orleans	157.96
11/5/2019	Southwest Airlines - Roundtrip airfare for R. Walters to attend oral argument in New Orleans	157.96
12/4/2019	Renaissance New Orleans Arts Warehouse - Lodging for R. Walters & R. Henneke to attend oral argument	431.95
	FedEx Deliveries (x6)	150.00
	TOTAL	8454.42